

# **EXHIBIT DD**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR  
IMMIGRANT RIGHTS; LEAGUE OF  
WOMEN VOTERS OF VIRGINIA;  
LEAGUE OF WOMEN VOTERS OF  
VIRGINIA EDUCATION FUND;  
AFRICAN COMMUNITIES  
TOGETHER,

*Plaintiffs,*

v.

SUSAN BEALS, in her official capacity as  
Virginia Commissioner of Elections;  
JASON MIYARES, in his official capacity  
as Virginia Attorney General;

*Defendants.*

Civil Action No. 1:24-cv-1778

**SUPPLEMENTAL DECLARATION OF ANNA J. DORMAN**

I, Anna J. Dorman, declare as follows:

1. I am an attorney representing Plaintiffs Virginia Coalition for Immigrant Rights, League Of Women Voters Of Virginia, League Of Women Voters Of Virginia Education Fund, and African Communities Together. I have been employed by Protect Democracy as Counsel since April 2023. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge.

2. During the week of October 21, 2024, I spoke with two impacted voters who were removed from the Virginia voter rolls under the Purge Program.

**First Impacted Voter – Christine Rabassa**

3. On Monday, October 21, 2024, I spoke via telephone with Ms. Christine Rabassa.
4. Ms. Rabassa is a Henrico resident who, according to records obtained by Plaintiffs, had her voter registration canceled in accordance with E.O. 35.
5. Ms. Rabassa confirmed that she is a lifelong citizen of the United States and an eligible voter who has been registered to vote in the Commonwealth of Virginia for more than 20 years.
6. Ms. Rabassa confirmed that she had voted in “many” previous elections without incident and that voting is very important to her and something she prioritizes.
7. Ms. Rabassa told me that her driver’s license expired on August 3, 2024. She went to the Quioccasin Department of Motor Vehicles in Henrico on August 28, 2024 to secure a new license. She did not make any intentional changes in her voter registration or citizenship status during that interaction.
8. Ms. Rabassa was unaware of having received any notifications regarding her registration status from election officials via mail or any other medium between August and October, 2024.
9. Ms. Rabassa is a lifelong Republican.
10. Ms. Rabassa attempted to vote in person at the Government Center early voting location at Parham Road in Henrico in early October.
11. When she presented her identification, poll workers were unable to confirm her name on the poll books and called over the supervisor.

12. Ms. Rabassa was then taken to a separate room with the supervisor who informed her that her registration had been canceled. It was represented to Ms. Rabassa that her registration was canceled because the U.S. citizen box on her DMV paperwork back in August was not checked.
13. The supervisor then reviewed registration records and confirmed that Ms. Rabassa was an eligible voter. She was then required to re-register.
14. Ms. Rabassa was unable to vote on that day, was turned away from the polls and not offered a provisional ballot, and was required to return on a second occasion in order to cast her ballot.
15. Since receiving the list of individuals removed under the Purge Program on Tuesday, October 24, 2024, I have confirmed that Ms. Rabassa is included on the list and had her registration canceled on September 6, 2024.
16. I also confirmed that Ms. Rabassa has subsequently re-registered and that her current registration status is “active.”

**Second Impacted Voter – Ms. Shantae Martin**

17. On October 23, 2024, I spoke with a second impacted individual who had their registration canceled under the Purge Program.
18. This second individual, Shantae Martin, is a 37 year old resident of Prince William County, Virginia.
19. She is a United States citizen and was born and raised in the Commonwealth of Virginia.
20. Ms. Martin has been registered to vote in Virginia for more than 10 years and regularly participates in elections.

21. Ms. Martin told me that voting is very important to her because it brings her together with her grandmother.
22. Ms. Martin was removed from the voter rolls as a result of the Purge Program because Prince William County identified her as an alleged non-U.S. citizen, even though she was born in the United States and has been a U.S. citizen her entire life.
23. Ms. Martin only recently learned that she was no longer registered to vote when a volunteer with African Communities Together (“ACT”) called her to tell her her voter registration had been canceled.
24. She recalls receiving a flier in April that said something about being an illegal alien and being prohibited to vote, but represented to me that she did not pay it any attention because she has always voted in Prince William County, they have all her information and know that she is a citizen and eligible voter.
25. Ms. Martin informed me that she last went to the Department of Motor Vehicles in April to get her driver’s license.
26. Ms. Martin informed me that she did not recall being asked to confirm that she was a U.S. citizen at that time or being asked any questions about her citizenship.
27. Ms. Martin was already registered to vote long before getting her license so she did not even consider whether anything that happened there would impact her voting status.
28. Ms. Martin represented to me that she is worried that because she was removed from the voter rolls, she will be unable to vote in the 2024 General Election. She plans to use same day registration to vote in person on Election Day.

I declare under penalty of perjury that the foregoing Declaration is true and correct.

*Anna J. Dorman*

Executed on October 24, 2024